

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- x
Arias et al

Plaintiff(s),

-against-

48-11 Vernon Blvd. Rest., Inc. et al

**JOINT PROPOSED CIVIL CASE
MANAGEMENT PLAN**
23-cv-04285

Defendants(s),

-----x

The parties/counsel who conferred in drafting this joint proposed case management plan:

For Plaintiff(s): **Mark Marino**

For Defendant(s): **Brett Gallaway, McLaughlin & Stern, LLP**

- A. Do the parties request referral to the Court's ADR program? **Yes**
- B. Do the parties consent to proceed before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)?

Yes: If yes, fill out the AO 85 Notice, Consent and Reference of a Civil Action to a Magistrate Judge Form and file it on ECF. <https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge>.

✓ No: If no, do not indicate which party declines consent.

- C. The parties may wish to engage in settlement discussions.
If so, Plaintiff(s) will serve demand by **N/A** . Defendant(s) will respond by **N/A** .
- D. Defendant(s) will answer or otherwise respond to complaint by **N/A**, if not yet done. The parties will serve Rule 26(a)(1) initial disclosures by **June 2nd, 2025**, if not yet done. The parties will serve initial document requests and interrogatories on or before **June 18, 2025**. Any joinder and/or amendments of the pleadings must be made by **June 18, 2025**. The parties will complete fact discovery by **September 16, 2025**.

If the parties perform expert discovery, they will serve initial disclosures by **N/A** ; initial expert

depositions, will be completed by N/A, and the parties will file a joint letter certifying the close of all discovery by this same date.

Other considerations the parties wish to bring to the Court's attention, such as the need for electronic discovery or confidentiality order: